

MATTHEW T. CECIL
Nevada State Bar No. 9525
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Tel: (702) 669-4600
Fax: (702) 669-4650
Email: MTCecil@hollandhart.com

JEREMY T. NAFTEL
California State Bar No. 185215
JANINE M. BRAXTON
California State Bar No. 296321
(pro hac vice applications forthcoming)
MARTENSON, HASBROUCK & SIMON LLP
455 Capitol Mall, Suite 601
Sacramento, California 95814
Email: jnaftel@martensonlaw.com
jbraxton@martensonlaw.com

Attorneys for Defendant
U.S. SECURITY ASSOCIATES

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KARL HANSEN,

Plaintiff

v.

ELON MUSK; TESLA, INC.; TESLA
MOTORS, INC.; U.S. SECURITY
ASSOCIATES; DOES 1 THROUGH 50, THE
PENTA BUILDING GROUP, INC.,

Defendants

Case No.: 3:19-cv-00413

**STIPULATION TO EXTEND TIME FOR
DEFENDANT U.S. SECURITY
ASSOCIATES TO RESPOND TO THE
COMPLAINT**

WHEREAS, on July 19, 2019, Plaintiff KARL HANSEN ("Plaintiff") filed a complaint against Defendant U.S. SECURITY ASSOCIATES, ("Defendants") entitled *Karl Hansen v. Elon Musk, et al.* Case No. 3:19-cv-00413 (hereinafter the "Complaint") (collectively, Plaintiff and Defendant hereinafter shall be referred to as, the "Parties");

WHEREAS, on October 1, 2019 Defendant was served with the Complaint via personal service to the Registered Agent for Service of Process, CT Corp.;

1 WHEREAS, Defendant is appearing specially for the sole purpose of taking part in this
2 Stipulation and requests to the Court to extend the time for Defendant to answer or otherwise
3 respond to the Complaint;

4 WHEREAS, the Parties to the above-captioned action agreed to a 21-day extension of time
5 to answer or otherwise respond to the Complaint from October 22, 2019. Accordingly,
6 Defendant's response to the Complaint is due November 12, 2019.

7 THEREFORE, Plaintiff and Defendant respectfully request that the Court grant leave for
8 Defendant's time to respond to the Complaint to be extended to November 12, 2019.

9 **IT IS SO STIPULATED**

10 Dated: October 22, 2019

WATKINS & LETOFSKY, LLP

11 By: /s/ Joseph M. Ortuno

12 Daniel R. Watkins
13 Joseph M. Ortuno

14 Attorneys for Plaintiff
15 KARL HANSEN

16 Dated: October 22, 2019

HOLLAND & HART, LLP

17 By: /s/ Matthew T. Cecil

18 Matthew T. Cecil
19 Attorneys for Defendant
20 U.S. SECURITY ASSOCIATES

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated: October 23, 2019.

24 Walter G. Cobb

25 UNITED STATES MAGISTRATE JUDGE
26